

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**KHYATI ANDREWS,**

Plaintiff,

v.

**SEARS HOLDING CORPORATION,  
d/b/a SEARS,**

Defendant.

No. 08 C 406

Judge: Guzman

**MOTION FOR PROTECTIVE ORDER**

Now comes Defendant, Sears, Roebuck and Co. (incorrectly named Sears Holding Corporation, hereinafter “Sears”), pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and moves for entry of an Agreed Protective Order governing the disclosure of confidential proprietary information regarding certain documents which will be produced in the course of this litigation. In support of this motion, Defendant Sears states the following:

1. Defendant Sears agreed to produce certain information only upon the entry of an appropriate protective order stating that such documents and the information therein (together referred to as “confidential documents”) will be disclosed only as provided in the proposed Agreed Protective Order.

2. All parties’ attorneys have agreed to the terms of this protective order and have signed this protective order.

3. The provisions of the proposed Agreed Protective Order are necessary to ensure the confidentiality of the documents produced. The proposed Agreed Protective Order will be separately submitted electronically in accordance with the Court’s standing order.

WHEREFORE, Defendant Sears, Roebuck And Co., respectfully requests this Court to enter the proposed Agreed Protective Order.

Respectfully submitted,  
SEARS, ROEBUCK AND CO., Defendant

By: s/ Grady B. Murdock, Jr.  
One Of Its Attorneys

Grady B. Murdock, Jr. (#1992236)  
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Dated: April 7, 2008

**CERTIFICATE OF SERVICE**

I, Grady B. Murdock, Jr., an attorney, certify that a copy of the foregoing was served via the Court's ECF system on April 7, 2008, on the following parties:

Lisa R. Kane  
Darren A. Bodner  
Janice A. Wegner  
Michael S. Young  
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s/ Grady B. Murdock, Jr.